

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW HAMPSHIRE**

In Re:	*	Chapter 13
	*	Case No. 20-10424-BAH
Theresa Pearson,	*	
Debtor	*	
	*	

DEBTOR'S OBJECTION TO CHAPTER 13 TRUSTEE'S MOTION TO DISMISS CASE

Debtor, Theresa Pearson, by and through her attorneys, Notinger Law, PLLC, objects to the Chapter 13 Trustee's Motion to Dismiss as follows:

1. The Debtor has remedied the issues in items 1 and 2 of the Trustee's Motion by filing amended schedules I and J to more accurately affect Debtor's income through her seasonal business. Debtor has filed an amended plan which is scheduled for hearing on October 23, 2020.
2. The Debtor has completed the Affidavit in number 3 of the Trustee's objection.
3. The dispute regarding Katherine Drisko is still pending. Debtor has sued Drisko in the bankruptcy court to confirm she has a homestead exemption in her homestead (case no. 20-01024-BAH).
4. The Trustee has agreed to continue this hearing to the hearing on the amended plan on October 23, 2020.

WHEREFORE, Debtor respectfully requests this Court:

- A. Deny the motion to dismiss; and
- B. Grant such other relief as this Court deems just and equitable.

Respectfully submitted,
Theresa Pearson,
Debtor
By her attorneys:
Notinger Law, PLLC

Dated: September 17, 2020

By: /s/ Steven M. Notinger
Steven M. Notinger, Esq. (BNH #03229)
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Certificate of Service

I hereby certify that I have on this date served the foregoing document upon the parties registered to receive electronic notice in this matter via CM/ECF.

20-10424-BAH Notice will be electronically mailed to:

Brad C. Davis on behalf of Creditor Katherine Drisko
brad@davishuntlaw.com

Steven M. Notinger on behalf of Debtor Theresa Pearson
steve@notingerlaw.com, cheryl@notingerlaw.com; debbie@notingerlaw.com

Steven M. Notinger on behalf of Plaintiff Theresa Pearson
steve@notingerlaw.com, cheryl@notingerlaw.com; debbie@notingerlaw.com

Office of the U.S. Trustee
USTPRegion01.MR.ECF@usdoj.gov

Lawrence P. Sumski
SumskiCh13@gmail.com

Dated: September 17, 2020

By: /s/ Steven M. Notinger
Steven M. Notinger, Esq. (BNH #03229)